

GIBSON, DUNN & CRUTCHER LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306

(202) 955-8500 (202) 467-0539 Fax

www.gibsondunn.com

PUBLIC DOCUMENT

jprice@gibsondunn.com
dharrison@gibsondunn.com
adynes@gibsondunn.com
brohal@gibsondunn.com

February 4, 2002

(202) 955-8500

C 66296-00036

By E-Mail to FR0001@ustr.gov

PUBLIC DOCUMENT

Ms. Gloria Blue
Executive Secretary, Trade Policy Staff Committee
600 17th Street, N.W.
Office of the United States Trade Representative
Washington, D.C. 20508

Re: *Revision to Technical Definition in Pending Exclusion Request for Cold-Rolled Enameling Steel with Niobium (X-042)*

Dear Ms. Blue:

This letter is filed on behalf of Mitsubishi International Steel Inc. ("MISI") to revise the technical specifications provided in its January 15, 2002 comments on the pending exclusion request for Cold-Rolled Enameling Steel with Niobium (identified on the Office of the U.S. Trade Representative's web site as X-042). Specifically, the minimum Rankford value should be 1.7 and the maximum delta Rankford value should be 0.3. The corrected definition is as follows:

Thickness: 0.040 - 0.060 inches

Chemical composition

C (max weight 0.001%)

O (0.020%-0.040%)

Nb (0.030-0.050%)

Physical and Mechanical Properties

Max. Yield Point (MPa): 170

Max. Tensile Strength (MPa): 320

Min. Elongation %:	48(if 0.040-0.050 thickness range) 49(if 0.051-0.060 thickness range)
Min. Rankford value:	1.7
Max. Delta Rankford value:	0.3

r (Rankford) value:

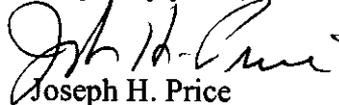
This is an index of deep-drawability, representing the ratio of sheet width deformation to sheet thickness deformation. The greater the r value, the lower the material flow-in resistance during press-forming, indicating better formability.

Delta Rankford value:

This is an anisotropic (longitudinal-direction) index of r value, representing the value of $\{(r_L+r_C)/2\}-r_{45^\circ}$ (degree). The smaller the value, the better the earing property. Compared to titanium (Ti)-added steel, Delta-r of niobium (Nb) is improved by more than 50%. The earing property improvement is the only effect of Nb addition.

If you have any questions or need additional information, please contact any one of the undersigned. Thank you for your assistance in the filing of this submission.

Very truly yours,



Joseph H. Price
Donald Harrison
Andrea Fekkes Dynes
Brian Rohal

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave., N.W.
Washington, D.C. 20036

Counsel for Nippon Steel Corporation

Ms. Gloria Blue
Executive Secretary, Trade Policy Staff Committee
February 4, 2002
Page 3

PUBLIC DOCUMENT

cc: Mr. Andrew Stephens
 Director of Steel Trade Policy, USTR (by e-mail)
Mr. Richard Weible/Mr. Mark Flessner
 ITA, Dept. of Commerce (by e-mail)
Alan Wm. Wolff/Kevin M. Dempsey/Jennifer Riccardi
 Dewey Ballantine LLP (by e-mail)
Robert E. Lighthizer/John J. Mangan/James C. Hecht/Ellen J. Schneider
 Skadden, Arps, Slate, Meagher & Flom LLP (by e-mail)
Roger B. Schagrin
 Schagrin Associates (by e-mail)

70199227_1.DOC